

More than 1.2 million Classification and Labelling notifications
for substances received by 1 December!
Less than a month before the deadline of 3 January 2011:
Manufacturers and importers, make sure that you notify yours, too!



WHAT IS THE C&L INVENTORY?

The Classification and Labelling Inventory or "C&L inventory" is defined in Articles 39 to 42 of the [CLP regulation](#)*

It is a **database maintained by ECHA** (European Chemicals Agency) that will contain basic classification and labelling information on notified and registered substances received from manufacturers and importers. It will also contain the list of harmonised classifications (Table 3.1 of Annex VI to CLP).

WHO HAS TO SUBMIT A NOTIFICATION?

Manufacturers and importers who are placing substances on the market that are either:

- **subject to registration under the REACH Regulation**, or
- **classified as hazardous** (irrespective of the quantity), or
- **imported in a mixture and are present above the relevant concentration limit**, which results in the classification of the mixture as hazardous according to CLP, or
- **imported in an article** and subject to registration under Article 7 of the [REACH Regulation](#)**.

There is **no exemption for notification** and even substances exempted under REACH must be notified if they are hazardous and placed on the market.

WHEN SHOULD I NOTIFY?

The substances must be notified **within one month** from being placed on the market. **The notification of substances already placed on the market on 1 December 2010 is due on 3 January 2011.**

Pay attention to notify!

- substances to register under REACH in 2013 and 2018 (FAQ 4.13)
- substances notified under Directive 67/548/EEC (NONS) (FAQ 3.4.2)

WHAT SHOULD I DO FIRST?

As a first step, you should read the [Practical guide 7: How to Notify Substances to the Classification & Labelling](#). This guidance helps you to identify whether you are obliged to notify your substance to the C&L Inventory. The guide will also provide you with an introduction on how to do the notification in practice.

* Regulation (EC) 1272/2008 on Classification, Labelling and Packaging of substances and mixtures, so called CLP came into force on 20 January 2009.

** Regulation (EC) 1907/2006 for Registration, Evaluation, Authorisation and Restriction of Chemicals, so called REACH came into force on 1 June 2007.

WHERE TO FIND FURTHER INFORMATION?

[REACH&CLP Helpdesk website](#)
e.g. presentation from [awareness campaign raising on CLP](#) (in French or German).

ECHA website

- Part ["notification to the classification and labelling inventory"](#)
- [Practical guide 7: How to Notify Substances to the Classification & Labelling](#)
- [CLP FAQs](#) (version 1.2) and in particular chapter 4 "Notification/C&L Inventory"
- [Technical Q&A on C&L notification](#) (version 1.0)
- Presentation ["C&L notification tips"](#)

Last minute!

ECHA Webinar (14 December, 10H30 to 11H30)
The main objective of the webinar is to help companies to make successful C&L notifications using the different IT tools. Registration (free of charge) on [ECHA's website](#).

NEWSLETTER

Special issue N°1 (Dec. 2010) – English version

PRACTICAL ISSUES FOR YOUR NOTIFICATION!

WHAT INFORMATION SHOULD BE INCLUDED?

Each notification should include (Art. 40 CLP):

- Name and contact details of the notifier;
- Identity of the substance, including name and other identifiers, information related to molecular and structural formula, composition, nature and amount of additives;
- Classification of the substance according to the CLP criteria;
- Reason for "no classification" in case the substance is classified in some but not all hazard classes or differentiations indicating whether this is due to
 - lack of data,
 - inconclusive data, or
 - data which is conclusive for non-classification;
- Specific concentration limits (SCL) or M-factors, where relevant, including a justification for setting them; and
- Label elements, including hazard pictograms, signal words, hazard statements and any supplemental hazard statements.

ECHA recommends:

- to provide the tonnage (not compulsory), as this will help to set priorities for missing data;
- to pay specific attention on [substance identification](#).

"I agree"

You can also take over the C&L that someone else already notified for your substance (see ch. 2.3, Practical Guide 7)

Think of contacting your trade association or your SIEF in order to do group notifications (see FAQ 4)

IT TOOLS FOR C&L NOTIFICATION

The notification can only be submitted electronically via the REACH-IT portal on the ECHA website. There are three ways to prepare a notification:

- IUCLID 5: allows you to include more than one composition for the same substance, useful for previous users of IUCLID 5.
- BULK XML: allows you to submit notification information for a large number of substances in a single file (using the EXCEL tool provided by ECHA), can only be used when each substance is identified either by CAS or EC number and identified by one composition only. In addition, no M-factor or SCL can be set,
- REACH-IT online (if only few substances to notify and IUCLID 5 is not used currently).

You can check your C&L notification before submitting it to ECHA with the [IUCLID 5 plug-in Technical Completeness Check \(TCC\)](#).

[IT Tools and user manuals](#) are available on ECHA's website.

CONFIDENTIALITY OF IUPAC NAMES

Companies not registering by the 2010 registration deadline but who are nevertheless obliged to notify the Classification and Labelling of substances to ECHA as of 3 January 2011 can, in certain cases, keep the IUPAC name confidential. For further information, see [ECHA News Alert of 13/08/2010](#).

These
FAQs
should
help you!

- 4.3 Is it necessary to notify a non-hazardous substance that is also registered under REACH to the Inventory?
- 4.10 The term "notification" has been used in various contexts in EU chemicals legislation. What is the difference between a notification under Directive 67/548/EEC, a notification under REACH, and a notification under CLP?
- 4.12 Downstream users (formulators, producers of articles, distributors...) do not need to notify to the C&L Inventory, because the notification of the substances should already have occurred at an earlier stage in the supply chain.
- 4.7 Importers and notification (use of the Annex VII translation tables)

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